



Serial No. 10/079,844

### REMARKS

In the Office Action the Examiner noted that claims 1-8 are pending in the application, and the Examiner rejected all claims. By this Amendment, claims 1-8 have been amended, and new claims 9-12 have been added. No new matter has been presented. Thus, claims 1-12 are pending in the application. The Examiner's rejections are traversed below, and reconsideration of all rejected claims is respectfully requested.

#### Claim Rejections Under 35 USC §101

In item 3 on pages 2-3 of the Office Action the Examiner rejected claims 1-3 under 35 U.S.C. §101 "because the claim of invention is directed to non-statutory subject matter." Claim 1 has been amended to place the claim in proper form, and withdrawal of the Examiner's §101 rejection is respectfully requested.

#### Claim Rejections Under 35 USC §112

In item 5 on page 3 of the Office Action the Examiner rejected claims 1, 4, 7, and 8, apparently under 35 U.S.C. §112, second paragraph, for various antecedent basis problems. By this Amendment, claims 1, 4, 7, and 8 have been amended to correct any antecedent basis errors. However, regarding the Examiner's listing of "the guest's own attributes" as having an antecedent basis problem, the Applicant respectfully submits that the antecedent basis is established for "the" guest, and the word "the" in that phrase does not refer to the language "own attributes." In other words, the Applicant respectfully submits that the language "own attributes", which clearly belong to "the guest", is in proper form for 35 U.S.C. §112.

In item 6 on page 3 of the Office Action the Examiner rejected claims 1-3 under 35 U.S.C. §112, second paragraph, "as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention." The Examiner stated, "It appears that the applicant is claiming a lodging management system in a program." The Examiner went on to explicitly ask, "Is it a program or a system applicant is trying to claim?"

The Applicant respectfully submits that the language of claim 1 clearly recites a service management program, and further that the service management program operates in conjunction with a lodging management system. The Applicant also respectfully submits that nothing in the recited claim language would reasonably lead one to believe that the lodging

management system is provided in the service management program. However, the Applicant has amended claim 1 to more clearly indicate that the lodging management system is responsible for the management of information about guests of the hotel from registration to check-out.

In item 7 on page 3 of the Office Action the Examiner rejected claims 2 and 5, apparently under 35 U.S.C. §112, second paragraph, for various antecedent basis problems. By this Amendment, claims 2 and 5 have been amended to correct any antecedent basis errors.

In item 8 on page 3 of the Office Action the Examiner rejected claims 3 and 6, apparently under 35 U.S.C. §112, second paragraph, for various antecedent basis problems. By this Amendment, claims 2 and 5 have been amended to correct any antecedent basis errors.

Therefore, the Applicant respectfully requests the withdrawal of the Examiner's §112 rejections of claim 1-8.

#### Claim Rejections Under 35 USC §102

In item 10 on pages 4-10 of the Office Action the Examiner rejected claims 1-8 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Application Publication No. 2003/0208386, issued to Brondrup (hereinafter referred to as "Brondrup"). The Applicant respectfully traverses the Examiner's rejections of these claims.

The Applicant respectfully submits that Brondrup does not disclose any of the features of the claimed invention, and will address various features of claim 1 as examples of features of the claimed invention which are not disclosed or suggested by Brondrup.

The Examiner stated that Brondrup discloses obtaining and inputting the room number of a guest when the guest visits the hotel facility, citing the language, in Lines 3-6 of Paragraph [0061], "The WAP hotel room reservation service may, upon or in conjunction with confirmation of the reservation, send a message to the phone, including the hotel room number."

Brondrup discloses a method of reserving and checking into a hotel through a wireless device, so as to avoid long lines at travel agencies and check-in desks (Paragraph [0003]). The user reserves a room at the hotel before arriving at the hotel, and then goes directly to the room reserved without checking in at a check-in desk (Paragraph [0040] through [0043]). The wireless locking system of the door recognizes a key transmitted from the user's wireless device, the key being sent to the user when the reservation was made, and unlocks the door while notifying the reservation service of the user's arrival. The user is aware of the room number

because it was transmitted to the user during the reservation process well before arrival at the hotel.

The Applicant respectfully submits that there is no mention of a user visiting any of the hotel facilities at all. Rather, Brondrup merely discusses the visit to the hotel room itself. Various examples of hotel facilities, which would be easily understood by one skilled in the art, are restaurants, theaters, bars, gymnasiums, etc, to name just a few examples given in the present application. Entering the hotel room is not tantamount to visiting the hotel facilities.

Further, assuming, arguendo, that entering the hotel room were to be considered as visiting the hotel facilities, the hotel reservation system of the hotel does not obtain and input the room number of the guest when the guest visits the room. While the hotel reservation system is notified of check-in when the user first arrives, the hotel reservation system is obviously already aware of the room number of the guest's room. There is no obtaining of the room number when the guest enters the room, the wireless door lock merely receives the valid key token issued to the user.

The Applicant is unable to determine how the Examiner has equated sending the hotel room number to the guest before arrival with "obtaining and inputting a room number of a guest when the guest visits the hotel facility", as is recited in claim 1 of the present application. Regarding the Examiner's citation of Lines 3-6 of Paragraph [0061] of Brondrup, it is quite obvious that the room number is sent to the mobile device of the guest when the guest makes the reservation, i.e., before he/she arrives at the hotel. This is in direct contrast to obtaining and inputting a room number of a guest when the guest visits the hotel facility, as is recited in claim 1 of the present application. And there is no obtaining the room number of the guest at all by the WAP hotel room reservation service. A room reservation service assigns a room number to a guest, therefore there is no room number beforehand that can be obtained.

Therefore, the Applicant respectfully submits that Brondrup does not disclose or suggest "obtaining and inputting a room number of a guest when the guest visits the hotel facility", as is recited in claim 1 of the present application.

The Examiner also stated that Brondrup discloses transmitting the room number of the guest to a lodging management system to obtain the information about the guest concerned, citing the language, in Lines 6-9 of Paragraph [0061], "Thus, even before the arrival at the hotel, the customer may know which room he/she has been assigned, and is then able go [sic] directly to the room without having to make a check-in at the reception desk of the hotel."

The Examiner has apparently equated the checking in of the guest in Brondrup as transmitting the room number of the guest to a lodging management system. The Applicant respectfully submits that this is not a reasonable interpretation of Brondrup, as Brondrup merely discloses notifying the hotel reservation/IT system of the arrival of the user for check-in (Paragraph [0043]), and not transmitting a room number to the lodging management system.

Further, even assuming, arguendo, that the check-in of Brondrup could be considered as transmitting the room number of the guest to the lodging management system, there is no obtaining the information about the guest concerned from the lodging management system. Perhaps the check-in process described by the Examiner could reasonably be interpreted as supplying information about a guest, insofar as the guest's arrival is considered as that information, but there is not transmission of the room number of the guest to the lodging management system to obtain the information about the guest concerned.

Therefore, the Applicant respectfully submits that Brondrup does not disclose or suggest "transmitting the room number of the guest to the lodging management system to obtain the information about the guest concerned."

The Examiner also stated that Brondrup discloses a service indication step of comparing a service management table for the management of the attributes of the services of the hotel facilities and for the management of the availabilities of the hotel facilities, with the guest's own attributes in the information about the guest which has been obtained from the lodging management system, and of indicating a service suitable for the guest's attributes. In support of this statement, the Examiner cited the language, in Lines 1-5 of Paragraph [0052], "Using a wireless application reservation service for flight tickets combined with the use of the Bluetooth technology, the customer will not need a flight ticket, and the Bluetooth phone could even be the 'boarding pass' letting the traveler through the boarding gate of an airport."

The Applicant respectfully submits that Examiner has not identified any of the elements of the above-cited feature of claim 1 in the offered section of Brondrup. Further, and with all due respect, the Applicant cannot even discern any connection whatsoever between claim 1 and the section of Brondrup cited by the Examiner. Paragraph [0052] of Brondrup cites an alternative example of the wireless reservation service which was otherwise described as being used in hotels. In the alternative example, the wireless reservation service is used to allow a traveler to use his wireless device as a boarding pass in order to bypass the standard ticketing and check-in process. The alternative example is not connected in any way to use of hotel facilities, and further does not contemplate any type of service management table, or obtaining guest attribute

information from a lodging management system, or of indicating a service suitable for the guest's attributes.

The Applicant respectfully submits that perhaps the Examiner has misunderstood at least this feature of claim 1. By comparing a service management table for the management of attributes of services of the hotel facilities, and for the management of availabilities of the hotel facilities, with the guest's own attributes in the information about the guest which has been obtained from the lodging management system, it is possible to indicate a service suitable for the guest's attributes such as, merely as an example of one possible embodiment, an available seat in a restaurant of the hotel. The guest's attributes may include, for example, VIP or repeat customer status, which would indicate that preferred seating should be provided. The service management table could be used to determine whether preferred seating is available for the guest, and arrange for reservation of that preferred seating. The attribute information of the guest is obtained from the lodging management system simply by transmitting the room number of the guest to the lodging management system.

The Applicant respectfully submits that the flight ticket reservation disclosed in Brondrup, and cited by the Examiner, is in no way connected to the services of hotel facilities, and further is in no way connected to obtaining guest attribute information from the lodging management system of the hotel. Therefore, the Applicant respectfully submits that Brondrup does not disclose or suggest, or even contemplate, "comparing a service management table for the management of attributes of services of the hotel facilities and for the management of availabilities of the hotel facilities, with the guest's own attributes in the information about the guest which has been obtained from the lodging management system, and of indicating a service suitable for the guest's attributes", as is recited in claim 1 of the present application.

Therefore, Brondrup apparently does not disclose any of the features discussed above. Accordingly, Brondrup does not disclose every element of the Applicant's claim 1. In order for a reference to anticipate a claim, the reference must teach each and every element of the claim (MPEP §2131). Therefore, since Brondrup does not disclose the features recited in independent claim 1, as stated above, it is respectfully submitted that claim 1 patentably distinguishes over Brondrup, and withdrawal of the §102(b) rejection is earnestly and respectfully solicited.

Claims 2-3 depend from claim 1 and include all of the features of that claim plus additional features which are not disclosed or suggested by Brondrup. Therefore, it is respectfully submitted that claims 2-3 also patentably distinguish over Brondrup.

Independent claims 4, 7, and 8 all recite similar features to those discussed in regard to claim 1 of the present application. Therefore, it is respectfully submitted that claims 4, 7, and 8 also patentably distinguish over Brondrup.

Claims 5-6 depend from claim 4 and include all of the features of that claim plus additional features which are not disclosed or suggested by Brondrup. Therefore, it is respectfully submitted that claims 5-6 also patentably distinguish over Brondrup.

#### New Claims 9-12

New claims 9-12 are directed to a method of managing services for at least one hotel facility, the method comprising obtaining a room number of a guest when the guest visits the hotel facility; obtaining information about the guest, based on the room number, from a lodging management system; and providing one or more of the services for the guest according to the guest information.

Therefore, it is respectfully submitted that new claims 9-12 also patentably distinguish over Brondrup.

#### Summary

In accordance with the foregoing, claims 1-8 have been amended, and new claims 9-12 have been added. No new matter has been presented. Thus, claims 1-12 are pending and under consideration.

There being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

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Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 09/12/06

By: Thomas L. Jones  
Thomas L. Jones  
Registration No. 53,908

1201 New York Avenue, NW, 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501